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Attorneys for Plaintiff Larry Eric Carness

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LARRY ERIC CARNESS,)	Case No.: 2:24-cv-00089-BNW
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
)	OF TIME TO FILE PLAINTIFF'S
vs.)	BRIEF AND [PROPOSED] ORDER
)	
)	(FIRST REQUEST)
MARTIN O'MALLEY,)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	

Plaintiff Larry Eric Carness and Martin O'Malley, Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this Court's approval, to extend the time from May 17, 2024 to June 25, 2024, for Plaintiff to file his brief with all other deadlines as per the Supplemental Rules for Social

1 Security Actions under 42 U.S.C. § 405(g) of the Federal Rules of Civil Procedure
2 extended accordingly. This is Plaintiff's first request for an extension. This request
3 is made at the request of Plaintiff's counsel to allow additional time to fully
4 research the issues presented. This request is made because Co-Counsel's 11-
5 month-old fell ill last month, necessitating her to take some leave to care for her
6 child. Since returning, she has faced a heavy briefing and hearing schedule as a
7 result of her absence. Consequently, counsel requires additional time to thoroughly
8 research the issues presented.

9 The parties request that the briefing schedule be modified as follows:
10 Plaintiff will file his brief by June 14, 2024. Defendant will file his defendant's

11 ///

12 ///

13 ///

1 brief by July 15, 2024. Plaintiff may file any optional reply within 14 days of the
2 service of the Commissioner's brief. The parties make this request in good faith
3 with no intention to unduly delay the proceedings

4 DATE: May 17, 2024

Respectfully submitted,

5 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

6 /s/ *Marc V. Kalagian*¹

7 BY: _____

Marc V. Kalagian
Attorney for plaintiff Larry Eric Carness

8
9 DATE: May 17, 2024

JASON M. FRIERSON
United States Attorney

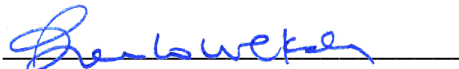
10
11 /s/ *Franco L. Becia*

12 BY: _____

13 Franco L. Becia
Special Assistant United States Attorney
14 [*authorized by e-mail]

15 DATED: 5/21/2024

16 IT IS SO ORDERED:

17 

18 BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

19
20
21
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24
25 _____
26 ¹ Counsel for the plaintiff attests that all other signatories listed, and on whose
behalf the filing is submitted, concur in the filing's content and have authorized the
filing.

CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:24-CV-00089-BNW

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on May 17, 2024.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff
